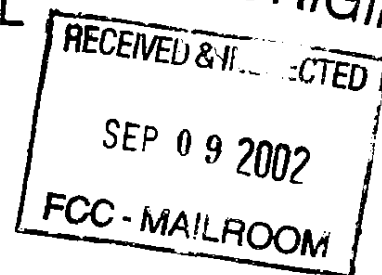






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August 22, 2002

Commissioner Michael J. Copps  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *Ex parte* contact in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-116; Universal Service Contribution Reform

Dear Commissioner Copps:

Cargill, Inc. is pleased that the Commission is considering new methods for funding universal service. The current approach, which assesses contribution obligations based on interstate and international revenues, is uneconomic and therefore unsustainable, and should be replaced with a method that assesses contribution obligation based on lines and activated **wireless** numbers. Cargill, however, strongly objects to a recent proposal made by certain state regulators to freeze the assessments attributable to residential lines.

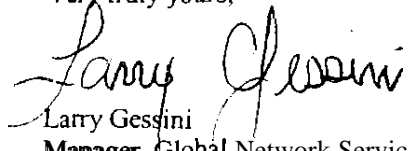
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The Commission should replace the current revenue-based universal service surcharge with a more equitable charge that would apply to every customer's connection to the network – to residential and business lines on wireline networks and activated telephone numbers on wireless networks. The Commission has requested comment on a universal service funding plan that includes such line and **number** charges, proposed by a coalition consisting of The Ad Hoc Telecommunications Users Committee, AT&T, e-TUG, and WorldCom. Under this proposal, increases and decreases in universal service subsidies would be **reflected in** uniform percentage adjustments to all per line and wireless number charges. Cargill, Inc. urges you to adopt this connection-based proposal.

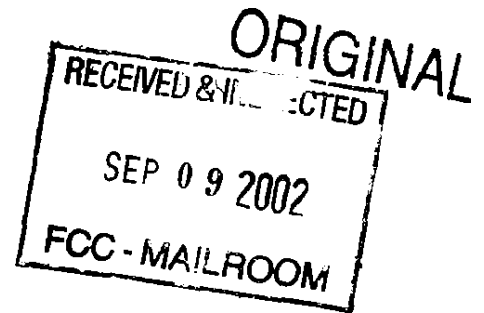
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Very truly yours,

  
Larry Gessini  
Manager, Global Network Services

/nn



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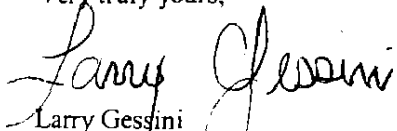
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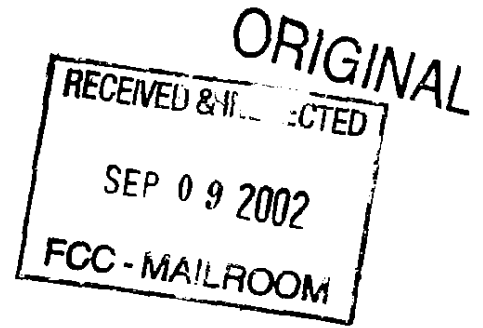
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Re: *Ex parte* contact ~~in~~ CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-1 **16**; Universal Service Contribution Reform

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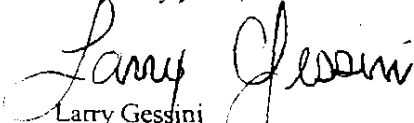
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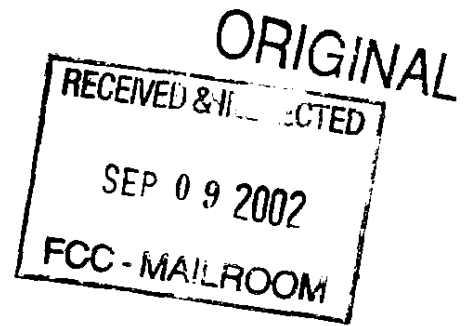
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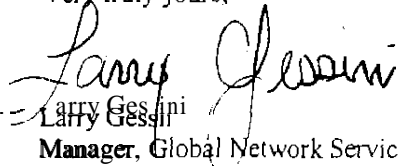
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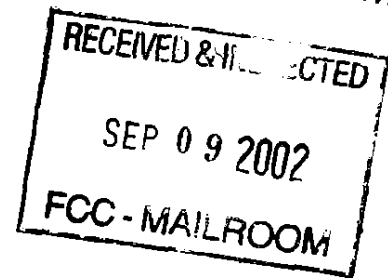
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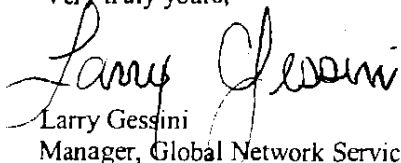
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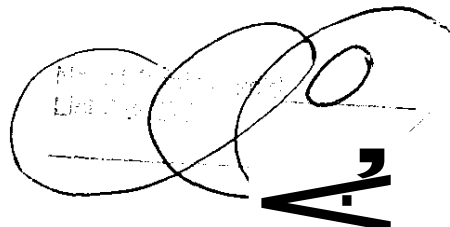
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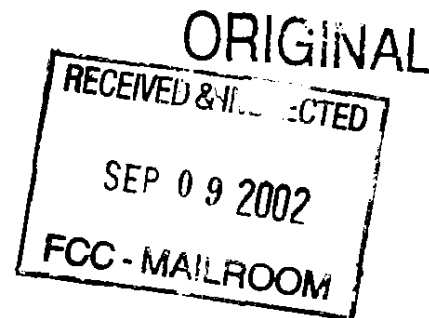
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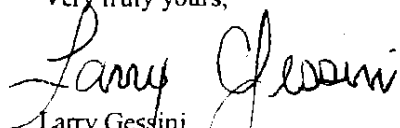
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